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11 Attorneys for Defendants
12 AMERICAN STAFFING OF NEVADA, INC. AND
13 AMERICAN STAFFING, INC.
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

11 BOBETTE COUSINEAU, an individual,

12 Plaintiff,

13 v.

14 AMERICAN STAFFING OF NEVADA, INC., a
15 domestic corporation; AMERICAN STAFFING,
16 INC., a foreign corporation; EXEL, INC. d/b/a
DHL SUPPLY CHAIN, a foreign corporation;
DOES I through X; and ROE Corporations XI
through XX, inclusive,

17 Defendants.

Case No.: 2:21-cv-01046-RFB-BNW

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE DEADLINE RE
FILING RESPONSIVE PLEADING**

[FIRST REQUEST]

19 Plaintiff BOBETTE COUSINEAU (“Plaintiff”) and Defendants AMERICAN STAFFING
20 OF NEVADA, INC. and AMERICAN STAFFING, INC., (jointly referred to as “Defendants”), by
21 and through their respective counsel of record, hereby stipulate and agree that Defendant shall have
22 until **June 18, 2021** to file its responsive pleading to Plaintiff’s Complaint (ECF No. 1), which
23 Complaint was filed with the Petition of Removal on June 2, 2021 (ECF No. 1) and served on May
24 6, 2021. The parties make this request due to scheduling conflicts and need for additional time to
25 investigate the allegations in the Complaint in order to respond.

26 If the requested extension is granted, Defendant will file its response to Plaintiff’s
27 Complaint on or before **June 18, 2021**.

1 This is the first request for an extension of time to file a responsive pleading made by the
2 parties and the parties make this request in good faith and not for the purpose of delay.

3 Dated: June 9, 2021

4 Respectfully submitted,

5 /s/ Christian Gabroy, Esq.

6 CHRISTIAN GABROY, ESQ.
7 KAINE MESSER, ESQ.
8 GABROY LAW OFFICES

9 Attorneys for Plaintiff
10 BOBETTE COUSINEAU

11 Dated: June 9, 2021

12 Respectfully submitted,

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14 Z. KATHRYN BRANSON, ESQ.
15 LITTLER MENDELSON, P.C.

16 Attorneys for Defendants
17 AMERICAN STAFFING OF NEVADA, INC.
18 and AMERICAN STAFFING, INC.

19 **ORDER**

20 **IT IS SO ORDERED.**

21 

22 UNITED STATES DISTRICT COURT
23 DATED: June 11, 2021